

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Northern Division**

STACEY DeGRAW, AS MOTHER AND  
NEXT FRIEND OF ELIZABETH  
STACEY CZAPLICKI, A MINOR

\*

\*

Plaintiff,

\*

Civil Action No. S-02-CV-2862

v.

\*

LEONARD E. MOODISPAW, TRUSTEE  
OF THE EDWARD JOSEPH CZAPLICKI  
IRREVOCABLE INSURANCE TRUST

\*

\*

Defendant.

\*

\* \* \* \* \*

**AFFIDAVIT OF LEONARD E. MOODISPAW**

I, Leonard E. Moodispaw, declare under penalty of perjury that I am over eighteen years of age and that the statements set forth in this instrument are true and correct to the best of my knowledge, information and belief.

1. I am the trustee of the Edward Joseph Czaplicki Irrevocable Trust.

2. I personally knew Edward Joseph Czaplicki ("Czaplicki") during his lifetime and spoke with Czaplicki about the fund he planned to provide for his daughter Elizabeth Czaplicki ("Elizabeth") pursuant to the Settlement Agreement attached as ***Exhibit 1*** to Plaintiff's Motion for Summary Judgment. Czaplicki informed me prior to his death that he wished that the proceeds from his life insurance be administered by me as trustee of the Edward Joseph Czaplicki Irrevocable Trust.

3. Czaplicki informed me that he was concerned that Stacey DeGraw ("DeGraw") would not administer the life insurance proceeds in Elizabeth's best

interests and requested that I administer the proceeds as trustee in conjunction with DeGraw.

4. It is my understanding that I would work with DeGraw in her capacity as administrator of the proceeds for Elizabeth, and that I would provide a balance to DeGraw and ensure that the funds would be used solely for the educational and health needs of Elizabeth.

5. As trustee, I would provide funds when DeGraw presents appropriate documentation to support Elizabeth's needs and I would either reimburse DeGraw or make payment directly on behalf of Elizabeth.

Further affiant sayeth not.

I HEREBY CERTIFY that the foregoing Affidavit is true and correct based upon my personal knowledge.

Date:\_\_\_\_\_

\_\_\_\_\_/s/\*  
Leonard E. Moodispaw

\*Counsel hereby certifies that he or she has a signed copy of the foregoing document available for inspection at any time by the court or a party to this action.